

1      Timothy P. Harris, Pro Se'  
2      4005 Cherokee Rose Ave.  
3      North Las Vegas, NV. 89031  
4      702-371-3658  
5      extremeps1@cox.net  
6

10/20/2010 22

7                   **IN THE UNITED STATES DISTRICT COURT**  
8                   **FOR THE DISTRICT OF NEVADA**

Timothy P. Harris, Pro Se' )  
Plaintiff                 )  
V.                         )  
AMERICAN GENERAL FINANCIAL )                                  Case No: 2:10-cv-01662-GMN-LRL  
SERVICES OF AMERICA, INC. )                                  Civil Rights Violation Complaint  
Defendant                 )                                      Trial By Jury Demanded

9                   **NOTICE OF MOTION AND MOTION FOR SUMMARY JUDGMENT**

10                   **TO: ALL INTERESTED PARTIES AND THEIR ATTORNEYS OF RECORD:**

11                   **NOTICE IS HEREBY GIVEN** that on Wednesday, November 17, 2010 a copy of this Notice  
12 of Motion was sent to the Defendant, American General Services Of America, Inc.'s counsel in  
13 an attempt to once again try to come to a resolution in this matter without needing to waste the  
14 courts time. The Notice was sent by way of United States Postal Service Certified Mail Return  
15 Receipt 7009 3410 0001 0346 3607 which the defense counsel received on Thursday, November  
16 18, 2010 and as of 10:00am on Monday November 22, 2010 there has been no reply. May it be  
17 noted that this day, Monday, November 22<sup>nd</sup>, 2010, on or about 11:00am, or as soon thereafter as  
18 the matter may be heard of this Court, Plaintiff will move this Court for an order granting  
19 summary judgment in favor of the Plaintiff, pursuant to FRCP rule 56, on the grounds that  
20 Defendant pulled Plaintiff's credit report during litigation under false pretenses which is a  
21 violation of FCRA Act § 619 Obtaining information under false pretenses [15 U.S.C. § 1681q]  
22 and supported with the follow case law:  
23

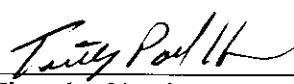
24  
25                   Rice v. Montgomery Ward & Co., Inc. 450 F. Supp. 688, 670-72 (M.D. N.C. 1978) (Defendant  
26 violates FCRA if it obtains a consumer report on Plaintiff after Plaintiff institutes an action  
27 against defendant. Such an inquiry is impermissible.);

28  
29 Bils v. Nixon, Hargrave, Devans & Doyle, 880 P.2d 743 (Ariz. App. 1994) (improper to get  
30 report to discover information which might be used in litigation); Duncan v. Handmaker, 149  
31 F.3d 424, 426-28 (6th Cir. 1998) (no legitimate business needs to obtain report to prepare for  
32 litigation); Bakker v. Mekinnon, 152 F.3d 1007, 1011-12 (8th Cir. 1998) (same);  
33  
34 Auriemma v. Montgomery, 860 f.2d 273, 279, 280-281 (7th Cir. 1998) (extra-judicial I  
35 investigation by attorneys improper; no privilege);  
36  
37 Mone v. Dranow, 945 F.2d 306, 308 (9th Cir. 1991) (obtaining credit report to investigate for  
38 purposes of litigation improper);  
39  
40 Boothe v. TRW Credit Data, 557 F. Supp. 66, 70-71 (S.D.N.Y. 1982); Rylewicz v. Beaton  
41 Services, Ltd., 698 F. Supp.. 1391, 1400 n. 10 (N.D. Ill. 1988), aff'd 888F.2d 1175, 1181 (7th  
42 Cir. 1989); Houghton v. N.J. Maunfacturer's Ins. Co., 795 F.2d 1144, 1149 (3d Cir. 1986)  
43 (obtaining report after litigation for use in litigation improper).  
44

45 Plaintiff is also entitled to summary judgment as a matter of law.  
46

47 This motion is based on this Notice, the records and papers on file herein, the attached  
48 Memorandum of Points and Authorities, the Affidavit of Timothy Harris, the attached Separate  
49 Statement of Undisputed Material Facts, and on such other evidence as may be presented at the  
50 hearing of this motion.

51  
52 Respectfully submitted this 22<sup>nd</sup> day of November, 2010.  
53

54   
55 \_\_\_\_\_  
56 Timothy Harris  
57 4005 Cherokee Rose Ave.  
58 North Las Vegas, NV 89031  
59 702-371-3658  
60 extremeps1@cox.net

64

## CERTIFICATE OF SERVICE

65

66 I, the Plaintiff, Timothy Harris, does hereby certify that a copy of this Notice and Motion For  
67 Summary Judgment was sent to the Defendant American General Financial Services Of  
68 America, Inc. through their attorney of record David W. Dachelet, Esq., Nevada Bar No. 6615,  
69 300 South Fourth Street, Suite 1400, Las Vegas, Nevada 89101 for the purpose of satisfying the  
70 requirement for Notice and Service and was sent via the United States Postal Service pursuant to  
71 Federal Rules of Civil Procedure 4 (c) (2) (c) (i). This will also be available to any and all  
72 PACER ECF participants and will serve as Notice and Service.

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

**MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF PLAINTIFF'S  
MOTION FOR SUMMARY JUDGMENT**

## I. STATEMENT OF FACTS

Plaintiff's complaint for Defendant's continual violation of Plaintiff's civil rights is based on the Fair Credit Reporting Act § 619. Obtaining information under false pretenses [15 U.S.C. § 1681q].

## II. STATEMENT OF FACTS

By this motion of summary judgment, brought pursuant to FRCP rule 56, Plaintiff contends Defendant has pulled Plaintiff's credit report during litigation under false pretenses which is a violation of FCRA Act § 619 Obtaining information under false pretenses [15 U.S.C. § 1681q] is a violation AND is a grounds for motioning the court to proceed with summary judgment.

### III. ARGUMENT

1. Plaintiff is entitled for summary judgment because Defendant has obtained Plaintiff's information under false pretenses § 619 Obtaining information under false pretenses [15 U.S.C. § 1681q]: Any person who knowingly and willfully obtains information on a consumer from a

28 consumer reporting agency under false pretenses shall be fined under title 18, United States  
29 Code, imprisoned for not more than 2 years, or both.

30  
31 2. Summary judgment is supported by the following case law:

32 Rice v. Montgomery Ward & Co., Inc. 450 F. Supp. 688, 670-72 (M.D. N.C. 1978) (Defendant  
33 violates FCRA if it obtains a consumer report on Plaintiff after Plaintiff institutes an action  
34 against defendant. Such an inquiry is impermissible.);

35  
36 Bils v. Nixon, Hargrave, Devans & Doyle, 880 P.2d 743 (Ariz. App. 1994) (improper to get  
37 report to discover information which might be used in litigation); Duncan v. Handmaker, 149  
38 F.3d 424, 426-28 (6th Cir. 1998) (no legitimate business needs to obtain report to prepare for  
39 litigation); Bakker v. Mckinnon, 152 F.3d 1007, 1011-12 (8th Cir. 1998) (same);

40  
41 Auriemma v. Montgomery, 860 f.2d 273, 279, 280-281 (7th Cir. 1998) (extra-judicial I  
42 investigation by attorneys improper; no privilege);

43  
44 Mone v. Dranow, 945 F.2d 306, 308 (9th Cir. 1991) (obtaining credit report to investigate for  
45 purposes of litigation improper);

46  
47 Boothe v. TRW Credit Data, 557 F. Supp. 66, 70-71 (S.D.N.Y. 1982); Rylewicz v. Beaton  
48 Services, Ltd., 698 F. Supp. 1391, 1400 n. 10 (N.D. Ill. 1988), aff'd 888F.2d 1175, 1181 (7th  
49 Cir. 1989); Houghton v. N.J. Maunfacturer's Ins. Co., 795 F.2d 1144, 1149 (3d Cir. 1986)  
50 (obtaining report after litigation for use in litigation improper).

51  
52 **IV. CONCLUSION**

53 Based on the foregoing, Plaintiff respectfully submits that he has established legal grounds to  
54 Defendant's action, and therefore, his motion for summary judgment should be granted.

55  
56  
57 Respectfully submitted this 22<sup>nd</sup> day of November, 2010  
58

*Timothy P. Harris*

Timothy Harris  
4005 Cherokee Rose Ave.  
North Las Vegas, NV 89031  
702-371-3658  
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**CERTIFICATE OF SERVICE**

I, the Plaintiff, Timothy Harris, does hereby certify that a copy of this Memorandum Of Points And Authorities was sent to the Defendant American General Financial Services Of America, Inc. through their attorney of record David W. Dachelet, Esq., Nevada Bar No. 6615, 300 South Fourth Street, Suite 1400, Las Vegas, Nevada 89101 for the purpose of satisfying the requirement for Notice and Service and was sent via the United States Postal Service pursuant to Federal Rules of Civil Procedure 4 (c) (2) (c) (i). This will also be available to any and all PACER ECF participants and will serve as Notice and Service.

*Timothy P. Harris*

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

Timothy P. Harris, Pro Se' )  
Plaintiff ) Case No: 2:10-cv-01662-GMN-LRL  
V. )  
AMERICAN GENERAL FINANCIAL )  
SERVICES OF AMERICA, INC. )  
Defendant )  
 ) Civil Rights Violation Complaint  
 ) Trial By Jury Demanded

**PLAINTIFF'S SEPARATE STATEMENT OF UNDISPUTED MATERIAL FACTS IN  
SUPPORT OF MOTION FOR SUMMARY JUDGMENT**

### **Statement of Uncontroverted Material Facts**

Plaintiff, Timothy Harris, respectfully submits the following Separate Statement of Undisputed Material Facts in support of his motion for summary judgment, pursuant to FRCP rule 56:

**Moving Party's Undisputed Material Facts and Supporting Evidence:**

19 1. Plaintiff is a Consumer protected by the law under the Fair Credit Reporting Act 15 USC §  
20 1681, et seq.  
21 2. Defendant is a Credit Lender/Information Provider and as such governed under the law by The  
22 Fair Credit Reporting Act 15 USC § 1681, et seq.  
23 3. Plaintiff pulled a copy of his credit report on November 15<sup>th</sup>, 2010, and saw that Defendant  
24 had been in his credit report and made changes to the information being reported.  
25 4. Plaintiff never gave permission for Defendant to pull Plaintiff's credit report nor did  
26 Defendant have any permissible purpose to obtain Plaintiff's information.

28     4. Plaintiff never gave permission for Defendant to pull Plaintiff's credit report nor did  
29     Defendant have any permissible purpose to obtain Plaintiff's information.  
30     5. Therefore, Defendant has broken the law by obtaining Plaintiff's information under false  
31     pretenses [15 U.S.C. § 1681q] which is fineable under title 18, United States Code, and subject  
32     to imprisonment for not more than 2 years, or both.  
33     6. Additionally, Defendant has also broken the law by pulling Plaintiff's credit report during  
34     litigation. The following case law supports the illegality of Defendant's action:

35  
36                 Rice v. Montgomery Ward & Co., Inc. 450 F. Supp. 688, 670-72 (M.D. N.C. 1978)  
37                 (Defendant violates FCRA if it obtains a consumer report on Plaintiff after Plaintiff  
38                 institutes an action against defendant. Such an inquiry is impermissible.);

39  
40                 Bils v. Nixon, Hargrave, Devans & Doyle, 880 P.2d 743 (Ariz. App. 1994) (improper to  
41                 get report to discover information which might be used in litigation); Duncan v.  
42                 Handmaker, 149 F.3d 424, 426-28 (6th Cir. 1998) (no legitimate business needs to obtain  
43                 report to prepare for litigation); Bakker v. Mckinnon, 152 F.3d 1007, 1011-12 (8th Cir.  
44                 1998) (same);

45  
46                 Auriemma v. Montgomery, 860 f.2d 273, 279, 280-281 (7th Cir. 1998) (extra-judicial I  
47                 nvestigation by attorneys improper; no privilege);

48  
49                 Mone v. Dranow, 945 F.2d 306, 308 (9th Cir. 1991) (obtaining credit report to investigate  
50                 for purposes of litigation improper);

51  
52                 Boothe v. TRW Credit Data, 557 F. Supp. 66, 70-71 (S.D.N.Y. 1982); Rylewicz v.  
53                 Beaton Services, Ltd., 698 F. Supp.. 1391, 1400 n. 10 (N.D. Ill. 1988), aff'd 888F.2d  
54                 1175, 1181 (7th Cir. 1989); Houghton v. N.J. Maunfacturer's Ins. Co., 795 F.2d 1144,  
55                 1149 (3d Cir. 1986) (obtaining report after litigation for use in litigation improper).  
56

58 | Respectfully submitted this 22<sup>nd</sup> day of November, 2010.

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## CERTIFICATE OF SERVICE

I, the Plaintiff, Timothy Harris, does hereby certify that a copy of this Statement Of Undisputed Material Facts In Support Of Motion For Summary Judgment was sent to the Defendant American General Financial Services Of America, Inc. through their attorney of record David W. Dachelet, Esq., Nevada Bar No. 6615, 300 South Fourth Street, Suite 1400, Las Vegas, Nevada 89101 for the purpose of satisfying the requirement for Notice and Service and was sent via the United States Postal Service pursuant to Federal Rules of Civil Procedure 4 (c) (2) (c) (i). This will also be available to any and all PACER ECF participants and will serve as Notice and Service.

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

**PLAINTIFF'S REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF MOTION FOR  
SUMMARY JUDGMENT**

Plaintiff, Timothy Harris, respectfully requests that this Court take judicial notice of the following documents, pursuant to Federal Rules of 201, and N.R.S. 47.140, 47.150, 47.170 in support of his motion for summary judgment:

1. The records and files in [Timothy Harris vs. American General Financial Services of America, Inc., United States District Court For The District Of Nevada, case number 2:10-cv-01662-GMN-LRL] and more specifically, the Affidavit of Timothy Harris, a certified copy of which is attached hereto as Exhibit 1.
2. The records and files in [Timothy Harris vs. American General Financial Services of America, Inc., United States District Court For The District Of Nevada, case number 2:10-cv-01662-GMN-LRL] and more specifically, the copy of the credit reports which are attached to the Affidavit of Timothy Harris as Exhibit 1.

29 Respectfully submitted this 22<sup>nd</sup> day of November, 2010.

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\_\_\_\_\_  
Timothy Harris  
4005 Cherokee Rose Ave.  
North Las Vegas, NV 89031  
702-371-3658  
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40 **CERTIFICATE OF SERVICE**

41  
42 I, the Plaintiff, Timothy Harris, does hereby certify that a copy of this Request For judicial  
43 Notice In Support Of Motion For Summary Judgment was sent to the Defendant American  
44 General Financial Services Of America, Inc. through their attorney of record David W. Dachelet,  
45 Esq., Nevada Bar No. 6615, 300 South Fourth Street, Suite 1400, Las Vegas, Nevada 89101 for  
46 the purpose of satisfying the requirement for Notice and Service and was sent via the United  
47 States Postal Service pursuant to Federal Rules of Civil Procedure 4 (c) (2) (c) (i). This will also  
48 be available to any and all PACER ECF participants and will serve as Notice and Service.

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\_\_\_\_\_  
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7 **IN THE UNITED STATES DISTRICT COURT**  
8 **FOR THE DISTRICT OF NEVADA**

9 )  
10 Timothy P. Harris, Pro Se' )  
11 Plaintiff ) Case No: 2:10-cv-01662-GMN-LRL  
12 V. )  
13 ) Civil Rights Violation Complaint  
14 AMERICAN GENERAL FINANCIAL ) Trial By Jury Demanded  
15 SERVICES OF AMERICA, INC. )  
16 Defendant )

17 **AFFIDAVIT OF TIMOTHY HARRIS SUBMITTED IN SUPPORT OF PLAINTIFF'S**  
18 **MOTION FOR SUMMARY JUDGMENT**

19 I, Plaintiff, Timothy Harris, DECLARE:

20 1. I am the Plaintiff in the above-entitled case.

21 2. This affidavit is made in support of my motion for summary judgment.

22 3. Plaintiff has found that on or about November 15<sup>th</sup>, 2010 that the Defendant has once again  
23 pulled the Plaintiff's credit report without any permissible purpose. The Defendant has changed  
24 information on the report to COVER UP their complete and flagrant violation of the law in  
25 regards to the Fair Credit Reporting Act (FCRA) 15 USC §1681, et seq. Attached to this  
26 affidavit are Exhibits A,B,C, and D, which show how the Defendant has failed to mark the  
Plaintiff's alleged account in dispute and then the finally Exhibit E which shows how the  
Defendant has pulled the Plaintiff's report AFTER litigation has commenced in an attempt to  
cover up their past mistakes in regards to the FCRA.

27 4. Exhibit A shows the credit report received from Experian, dated June 30<sup>th</sup>, 2010 and this  
28 shows how the Plaintiff's alleged account has NOT been marked in dispute by the Defendant.  
29

30 5. Exhibit B shows the credit report received from Equifax, dated July 5<sup>th</sup>, 2010 and this shows  
31 how the Plaintiff's alleged account has NOT been marked in dispute by the Defendant.  
32

33 6. Exhibit C shows the credit report received from Transunion, dated July 6<sup>th</sup>, 2010 and this  
34 shows how the Plaintiff's alleged account has NOT been marked in dispute by the Defendant.  
35

36 7. Exhibit D shows the credit report pulled by the Plaintiff thru Privacy Guard, dated August  
37 25<sup>th</sup>, 2010 and this shows that the Plaintiff's alleged account has NOT been marked in dispute by  
38 the Defendant.  
39

40 8. Exhibit E shows the credit report pulled by the Plaintiff thru Privacy Guard, dated November  
41 17<sup>th</sup>, 2010 and this shows how now, AFTER litigation has commenced, the Defendant has all of  
42 a sudden changed the information on the Plaintiff's alleged account to show that it has been  
43 marked in dispute. Therefore, Defendant has broken the law by obtaining Plaintiff's information  
44 under false pretenses [15 U.S.C. § 1681q] which is fineable under title 18, United States Code,  
45 and subject to imprisonment for not more than 2 years, or both. Additionally, Defendant has also  
46 broken the law by pulling Plaintiff's credit report during litigation.  
47

48 9. The Plaintiff has sent a copy of all paperwork and documents used to support his Motion For  
49 Summary Judgment to the attorney for the Defendant via email and the United States Postal  
50 Service Certified Mail Return Receipt # 7009 3410 0001 0346 3607 in an attempt to get this  
51 matter resolved before having to proceed further in court.  
52

53 10. The foregoing is within my personal knowledge, and if called as a witness, I could  
54 competently testify thereto.  
55

56 I declare under penalty of perjury that the foregoing is true and correct.  
57 Executed this 17<sup>th</sup> day of November, 2010, at Clark County, Nevada.

58 Respectfully submitted this 17<sup>th</sup> day of November, 2010.

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*Timothy P. Harris*

Timothy Harris  
4005 Cherokee Rose Ave.  
North Las Vegas, NV 89031  
702-371-3658  
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67 State of NEVADA

68 County of CLARK

69

70 Subscribed and sworn to (or affirmed) before me, Cynthia Horner, Notary Public,  
71 on this 17 day of November, 2010 by Timothy Harris.

72 Proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

73

74 WITNESS my hand and official seal.

*Cynthia Horner*  
My Commission expires 11-13-13  
Notary Public



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## CERTIFICATE OF SERVICE

83 I, the Plaintiff, Timothy Harris, does hereby certify that a copy of this Declaration Submitted In  
84 Support Of Plaintiff's Motion For Judgment was sent to the Defendant American General  
85 Financial Services Of America, Inc. through their attorney of record David W. Dachelet, Esq.,  
86 Nevada Bar No. 6615, 300 South Fourth Street, Suite 1400, Las Vegas, Nevada 89101 for the  
87 purpose of satisfying the requirement for Notice and Service and was sent via the United States  
88 Postal Service pursuant to Federal Rules of Civil Procedure 4 (c) (2) (c) (i). This will also be  
89 available to any and all PACER ECF participants and will serve as Notice and Service.

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*Timothy P. Harris*

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# **EXHIBIT A**

# **EXHIBIT A**



**Prepared for**  
TIMOTHY PAUL HARRIS  
**Report number**  
1070-6058-87

**Report date** **Date Pulled**  
June 30, 2010   
www.experian.com/disputes  
PO BOX 9701, Allen, TX 75013 **Page 4 of 18**

## Accounts in good standing

These items may stay on your credit report for as long as they are open. Once an account is closed or paid off it may continue to appear on your report for up to ten years.

### Credit items

#### AMERICAN EDUCATION SVCS/NCT

1200 N 7TH ST  
HARRISBURG PA 17102

(800) 233-0577

#### Partial account number

1747379151PA0...

See History of account balances for additional information.

Date opened	Date of status	Type	Responsibility	Credit limit or original amount	Recent balance	Status: Open/Never late.
Jul 2007	May 2010	Installment	Subsidiary	\$1,000	\$0 as of May 2010	Address identification number: 500-233-0577
Reported since Aug 2007	Last reported May 2010	Terms 24 months	NA			

\$223

Monthly payment

Date opened	Date of status	Type	Responsibility	Credit limit or original amount	Recent balance	Status: Open/Never late.
Feb 2010	Jun 2010	Installment	Individual	\$4,494	\$4,178 as of Jun 2010	Address identification number: 599674340
Reported since Feb 2010	Last reported Jun 2010	Terms 24 Months	High balance NA	High balance \$236	Recent Payment \$236	
		Monthly payment \$236				

See History of account balances for additional information.

#### AMERICAN GENERAL FINANCE

1928 N DECATUR BLVD  
LAS VEGAS NV 89108

No phone number available

#### Partial account number

210118201187....

See History of account balances for additional information.

#### BACH HOME LOANS/COUNTRYWIDE

450 AMERICAN ST # SV416  
SIMI VALLEY CA 93065

(800) 669-6607

#### Partial account number

2267....

See History of account balances for additional information.

Date opened	Date of status	Type	Responsibility	Credit limit or original amount	Recent balance	Status: Open/Never late.
Aug 2009	Jun 2010	Mortgage	Individual	\$26,250	\$5,000 as of Jun 2010	Comment: "Account information disputed by consumer (Meets requirement of the Fair Credit Reporting Act)."
Reported since Aug 2009	Last reported Jun 2010	Terms Monthly payment	High balance NA	High balance \$5,000	Recent Payment \$5,000	Address identification number: 599674340

Original amount \$26,250 as of Jun 2010  
Comment: "Account information disputed by consumer (Meets requirement of the Fair Credit Reporting Act)."  
Address identification number: 599674340



# **EXHIBIT B**

# **EXHIBIT B**

Account Name	Account Number	Date Opened	Balance	Date Reported	Past Due	Account Status	Credit Limit					
Date Closed:	08/2009			Type of Loan:		VAF Real Estate Mortgage (Veteran's Administration)						
Date of First Delinquency:	N/A											
Comments:												
81-Month Payment History												
Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2009	*	*	*	*	*	*	*	*	*	*	*	*

[Back to Top](#)

## Installment Accounts

Installment accounts are credit accounts in which the amount of the payment and the number of payments are predetermined or fixed, such as a car loan.

### Open Accounts

Account Name	Account Number	Date Opened	Balance	Date Reported	Past Due	Account Status	Credit Limit
AMERICAN GENERAL FIN	210118201187XXXX	02/2010	\$4,178	06/2010	\$0	PAYS AS AGREED	

#### AMERICAN GENERAL FINANCE

4825 S Rainbow Blvd Ste 208  
Las Vegas, NV-891034748

Account Number:	210118201187XXXX	Current Status:	PAYS AS AGREED
Account Owner:	Individual Account	High Credit	\$4,494
Type of Account:	Instalment	Credit Limit:	
Term Duration:	24 Months	Terms Frequency:	
Date Opened:	02/2010	Balance:	\$4,178
Date Reported:	06/2010	Amount Past Due:	\$0
Date of Last Payment:	05/2010	Actual Payment Amount:	\$236
Scheduled Payment Amount:	\$236	Date of Last Activity:	05/2010
Date Major Delinquency First Reported:		Months Reviewed:	3
Creditor Classification:		Activity Description:	N/A
Charge Off Amount:		Deferred Payment Start Date:	
Balloon Payment Amount:		Balloon Payment Date:	
Date Closed:		Type of Loan:	Secured By Household Goods/Collateral
Date of First Delinquency:	N/A		
Comments:			

Date pulled

# **EXHIBIT C**

# **EXHIBIT C**



# **EXHIBIT D**

# **EXHIBIT D**

Closed:	[REDACTED]
<b>DEROGATORY SUMMARY:</b>	[REDACTED]
Inquiries:	[REDACTED]
Public Records:	[REDACTED]
Collections Accounts:	[REDACTED]
Current Delinquencies:	[REDACTED]
Prior Delinquencies:	[REDACTED]

Self-Pulled Report  
Thru Privacy Guard

**Account History**

Below is information on any accounts you may have opened in the past. Positive information regarding your accounts remains on your report indefinitely. Generally, a consumer reporting agency will not report negative information that is more than seven years old, or bankruptcies that are more than 10 years old.

**AMERICAN GENERAL FINAN**

	Experian	Equifax	TransUnion
<b>Account Name:</b>	<b>AMERICAN GENERAL FINAN</b>	<b>AMGNL</b>	
<b>Account Number:</b>	<b>210178801187XXXX</b>	<b>210178801187XXXX</b>	
<b>Account Type:</b>	<b>Installment</b>	<b>Installment</b>	
<b>Account Status:</b>	<b>Open</b>	<b>Open</b>	
<b>Monthly Payment:</b>	<b>\$236</b>	<b>\$236</b>	
<b>Date Opened:</b>	<b>02/2010</b>	<b>02/2010</b>	
<b>Balance:</b>	<b>\$4,068</b>	<b>\$4,068</b>	
<b>Terms:</b>	<b>24</b>		
<b>High Balance:</b>	<b>\$4,494</b>	<b>\$4,494</b>	
<b>Limit:</b>	<b>-</b>	<b>-</b>	
<b>Past Due:</b>	<b>-</b>	<b>-</b>	
<b>Payment Status:</b>	<b>Current</b>	<b>Current</b>	
<b>Comments:</b>			

**24-Month Payment History**

Date:	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	
	08	08	08	08	08	09	09	09	09	09	09	09	09	09	09	09	09	09	09	10	10	10	10	10	
<b>Experian:</b>																				OK	OK	OK	OK	OK	OK
<b>Equifax:</b>																				OK	OK	OK	OK	OK	OK
<b>TransUnion:</b>																									

	Experian	Equifax	TransUnion
<b>Account Name:</b>			
<b>Account Number:</b>			
<b>Account Type:</b>		<b>Installment</b>	
<b>Account Status:</b>		<b>Open</b>	
<b>Monthly Payment:</b>			
<b>Date Opened:</b>			
<b>Balance:</b>			
<b>Terms:</b>			

Date Pulled



# **EXHIBIT E**

# **EXHIBIT E**

Current:	•	•	•
Closed:	•	•	•
<b>DEROGATORY SUMMARY:</b>			
Inquiries:	•	•	•
Public Records:	•	•	•
Collections Accounts:	•	•	•
Current Delinquencies:	•	•	•
Prior Delinquencies:	•	•	•

**Account History**

Below is information on any accounts you may have opened in the past. Accounts that are paid as agreed can remain on your report for up to 10 years from the date of last activity. Typically, a consumer reporting agency will not report negative information that is more than seven years old, or bankruptcies that are more than 10 years old.

**ACCOUNTS**

	Experian	Equifax	TransUnion
Account Name:			[REDACTED]
Account Number:			[REDACTED]
Account Type:			Installment
Account Status:			Open
Monthly Payment:			\$236
Date Opened:			[REDACTED]
Balance:			[REDACTED]
Terms:			[REDACTED]
High Balance:			\$2,068
Limit:			-
Past Due:			[REDACTED]
Payment Status:			Current
Comments:			Unsecured

**24-Month Payment History**

Date:	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	
	08	08	09	09	09	09	09	09	09	09	09	09	09	09	09	10	10	10	10	10	10	10	10	10	10
Experian:																									
Equifax:																									
TransUnion:																									OK

**AMERICAN GENERAL FINAN**

	Experian	Equifax	TransUnion
Account Name:	AMERICAN GENERAL FINAN	AMGNL	AMER GEN FIN
Account Number:	210178801187XXXX	210118201187XXXX	210178801187XXXX
Account Type:	Installment	Installment	Installment
Account Status:	Open	Open	Open
Monthly Payment:	\$236	\$236	\$236
Date Opened:	02/2010	02/2010	02/2010
Balance:	\$4,068	\$4,178	\$4,068

Terms:	24		24
High Balance:	\$4,494	\$4,494	\$4,494
Limit:	-	-	-
Past Due:	\$959	\$0	\$959
Payment Status:	120 Days Late	Current	120 Days Late
Comments:	Account in dispute - reported by subscriber (FCBA) Account information disputed by customer		Secured By Household Goods & Other Collateral Account information disputed by consumer

**24-Month Payment History**

Date:	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct
08	08	09	09	09	09	09	09	09	09	09	09	09	09	09	10	10	10	10	10	10	10	10	10	10
Experian:															OK	60	90	120						
Equifax:															OK	OK	OK	OK						
TransUnion:															OK	OK	OK	ND	OK	OK	60	90	120	

~~HSBC BANK~~

	Experian	Equifax	TransUnion
Account Name:	HSBC BANK	HSBC BANK	HSBC BANK
Account Number:	100788199000	250029943999	520035500000
Account Type:	Revolving	Revolving	Revolving
Account Status:	Open	Open	Open
Monthly Payment:	-\$15	-\$15	-\$15
Date Opened:	07/2010	07/2010	07/2010
Balance:	-\$174	-\$174	-\$174
Terms:			0
High Balance:	\$400	-	\$700
Limit:	\$800	\$800	\$800
Past Due:	-	-	\$0
Payment Status:	Current	Current	Current
Comments:			Credit Card

**24-Month Payment History**

Date:	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct
08	08	09	09	09	09	09	09	09	09	09	09	09	09	09	10	10	10	10	10	10	10	10	10	10
Experian:															OK									
Equifax:															OK									
TransUnion:															OK									

~~PREFERRED CREDITLINE~~

	Experian	Equifax	TransUnion
Account Name:	PREFERRED CREDITLINE	PREFERRED CREDITLINE	PREFERRED CREDITLINE
Account Number:	0000000000	0000000000	0000000000
Account Type:	Installment	Installment	Installment
Account Status:	Open	Open	Open
Monthly Payment:	-\$5	-\$5	-\$5
Date Opened:	09/2009	09/2009	09/2009
Balance:	\$4,201	\$4,201	\$4,201

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